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November 5, 2015

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Antione Chambers,*
S1 13 Cr. 345 (LGS)

Dear Judge Schofield:

This letter is submitted on behalf of defendant Antione Chambers, whom I represent in the above-entitled case, and, for the reasons set forth below, respectfully requests a two-week adjournment of Mr. Chambers's sentencing hearing, currently scheduled for Tuesday, November 17, 2015. I have been in contact with Assistant United States Attorney Amy Lester, who has informed me that the government does not object to this request.

The adjournment of the sentencing is requested because of certain scheduling commitments – including a Brief on Appeal in the United States Court of Appeals for the Ninth Circuit in *United States v. Moalin*, Docket No. 13-50572, which was filed October 29, 2015 (and involved a complex issue of first impression), as well as business travel for that and another case outside New York State – that have delayed the preparation of the sentencing submission on Mr. Chambers's behalf. Also, the additional time will enable counsel and Mr. Chambers to resolve the issue he raised in his letter to the Court (that was docketed September 17, 2015).


Regarding potential dates, AUSA Lester has informed me she is not available December 7, 2015, or December 8, 2015. I am not available December 15, 2015 (due to court appearances in New York State court in the morning and the Eastern District in the Islip courthouse in the afternoon), December 16, 2015 (due to a sentencing in the Eastern District), December 17, 2015 (due to a court appearance in the Northern District of California, and December 18, 2015 (which is my CJA duty day in the Southern District). I also have a sentencing December 21, 2015, at 10 a.m., in the Southern District, but would be available for sentencing in this case later that day. I would also prefer not to have the sentencing scheduled for December 11, 2015, as I have an appellate brief due that day in the Second Circuit.

LAW OFFICES OF
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Accordingly, for the reasons set forth above, it is respectfully requested that Mr. Chambers's sentencing be adjourned for one month. As noted above, the government does not object to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel

JLD/wgs

cc: Negar Tekeei
Amy Lester
Assistant United States Attorneys